

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Shon Morgan (Bar No. 187736)  
3 shonmorgan@quinnemanuel.com  
4 865 South Figueroa Street, 10<sup>th</sup> Floor  
5 Los Angeles, California 90017-2543  
6 Telephone: (213) 443-3000  
7 Facsimile: (213) 443-3100  
8 Kari Wohlschlegel (Bar No. 294807)  
9 kariwohlschlegel@quinnemanuel.com  
10 Tina Lo (Bar No. 311184)  
11 tinalo@quinnemanuel.com  
12 Christine W. Chen (Bar No. 327581)  
13 christinechen@quinnemanuel.com  
14 50 California Street, 22nd Floor  
15 San Francisco, CA 94111  
16 Telephone: (415) 875-6600  
17 Facsimile: (415) 875-6700

18 *Attorneys for Defendants*

19 UNITED STATES DISTRICT COURT

20 CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION

21 *In re: Hyundai and Kia Engine*  
22 *Litigation*

CASE NO. 8:17-cv-00838

Member Cases:  
8:17-cv-01365-JLS-JDE  
8:17-cv-02208-JLS-JDE  
2:18-cv-05255-JLS-JDE  
8:18-cv-00622-JLS-JDE

Related Case:  
8:18-cv-02223-JLS-JDE

**DEFENDANTS' NOTICE  
REGARDING SETTLEMENT  
EXCLUSIONS**

Date: November 13, 2020  
Time: 10:30 a.m.  
The Hon. Josephine L. Staton  
Courtroom: 10A

1 In order to assist the Court's evaluation at the final fairness hearing,  
2 defendants provide this summary of class exclusions. Of the 6.5 million notices sent  
3 to current and former owners and lessees of 2.23 million Hyundai Class Vehicles,  
4 Hyundai received exclusion requests from 505 class members opting out 436 Class  
5 Vehicles. Of the 4.10 million notices sent to current and former owners and lessees  
6 of 1.73 million Kia Class Vehicles, Kia received exclusion requests from 1,164  
7 class members for 932 Class Vehicles. Defendants also received 4 opt outs that  
8 were untimely because they were postmarked after October 30, 2020. Any  
9 exclusion requests that included incomplete or inaccurate information, such that  
10 defendants could not identify the requestor, class vehicle, or VIN, were considered  
11 invalid. And exclusion requests that attempted to opt out a non-Class Vehicle were  
12 not counted.

13 Defendants are still reviewing and attempting to verify approximately 58  
14 exclusion requests that failed to provide complete information. Defendants will file  
15 a supplemental notice with updated numbers, as well as a complete list of class  
16 members' names and VINs that seek to opt out, in advance of the final fairness  
17 hearing.

18  
19 DATED: November 10, 2020

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

20  
21 By /s/ Shon Morgan

Shon Morgan  
Attorneys for Kia Motors America, Inc.,  
Kia Motors Corporation, Hyundai Motor  
America, Inc., and Hyundai Motor  
Company, Ltd.